REMARKS

Claims 1, 3-13, 15-21, and 23-28 are currently pending. Claims 2, 14, and 22 have been cancelled and claims 13 and 15-20 have been amended. No new matter has been added. Applicants reserve the right to pursue original and other claims in this and in other applications.

Claims 13-20 stand rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. The Office states that these "claims recite functional descriptive material...comprising computer programs or algorithms that impart functionality when employed as a computer component....Functional descriptive material must be embodied on a computer readable medium to impart its functionality." Applicants respectfully traverse this rejection.

Claims 13-20 have been amended consistent with the suggestion of the Office. No new matter has been added. The rejection of claims 13-20 should respectfully be withdrawn and the claims allowed over 35 U.S.C. §101.

Claims 27 and 28 stand rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claims 27 and 28 are unambiguous and definite and therefore in compliance with 35 U.S.C. §112, second paragraph. Claim 27 is definite and recites an operation of a table converter as part of the image-area separation process. Claim 28 is definite and refers to intermediate data being calculated and used as part of a sequential process. Thus, the

rejection of claims 27 and 28 should be withdrawn and the claims allowed over 35 U.S.C. §112, second paragraph.

Claims 1, 3-5, 9, 11, and 12 stand rejected under 35 U.S.C. §102(a) as being anticipated by Nomizu (U.S. Pat. Pub. No. 20030095272)("Nomizu"). Applicants respectfully traverse this rejection.

Claim 1 recites, *inter alia*, an image-area separation apparatus, comprising: "a SIMD processor for performing an image-area separation process using SIMD processing, said SIMD processor having an associated image area separating means configured such that said SIMD processor separates image data into a character portion and a figure portion."

Nomizu discloses an data processing devices that simultaneously parallel processes data. The Office identifies the allegedly relevant passages of Nomizu, i.e., [0244], [0249]-[0255], [0292], [0296]-[0304], which discloses performing edge area judgment. The result of the determination is whether an identified block of pixels is a character.

Nomizu fails to disclose "said SIMD processor having an associated image area separating means configured such that said SIMD processor separates image data into a character portion and a figure portion." As noted above, Nomizu only discloses performing edge area judgment to determine whether a pixel region is a character. Nomizu teaches processing the image as a whole and does not teach separating the image data into a "character portion" from the "figure portion." As such, the rejection of claim 1 should be withdrawn and claim 1 and its dependant claims allowed over Nomizu.

With respect to claim 11, Nomizu fails to disclose "a SIMD processor for performing an image-area separation process, said SIMD processor having an associated image-area separation means configured such that SIMD processor separates image data into a character portion and a figure portion" As noted above, Nomizu only discloses performing edge area judgment to determine whether a pixel region is a character. Nomizu does not teach separating the image data into a "character portion" from the "figure portion." As such, the rejection of claim 11 should be withdrawn and claim 11 allowed over Nomizu.

With respect to claim 12, Nomizu fails to disclose "said SIMD processor having an associated image-area separation means configured such that said SIMD processor separates image data into a character portion and a figure portion" and "an image-processing means for switching over contents of the image data in accordance with the result of the image-separation operation performed by the image-separation apparatus." Nomizu only discloses performing edge area judgment to determine whether a pixel region is a character. Nomizu does not teach separating the image data into a "character portion" from the "figure portion." As such, the rejection of claim 12 should be withdrawn and claim 12 allowed over Nomizu.

Claims 1, 3, and 11 stand rejected under 35 U.S.C. §102(a) as being anticipated by Chatterjee (U.S. Pat. No. 5,317,652)("Chatterjee"). Applicants respectfully traverse this rejection.

Chatterjee discloses an optical character recognition system for orientation independence and position independence.

Chatterjee fails to disclose "said SIMD processor having an associated image area separating means configured such that said SIMD processor separates image data into a character portion and a figure portion." As noted above, Chatterjee discloses an optical character recognition system for orientation independence and position independence. Chatterjee is directed at a different issue and teaches processing an image area and recognizing characters and does not teach or concerned with separating the image data into a "character portion" from the "figure portion." As such, the rejection of claim 1 should be withdrawn and claim 1 and its dependant claims allowed over Chatterjee.

With respect to claim 11, Chatterjee fails to disclose "a SIMD processor for performing an image-area separation process, said SIMD processor having an associated image-area separation means configured such that SIMD processor separates image data into a character portion and a figure portion" As noted above, Chatterjee discloses an optical character recognition system for orientation independence and position independence and does not teach separating the image data into a "character portion" from the "figure portion." As such, the rejection of claim 11 should be withdrawn and claim 11 allowed over Chatterjee.

Claims 1 and 11 stand rejected under 35 U.S.C. §102(a) as being anticipated by Martins et al. (U.S. Pat. No. 6,771,834)("Martins"). Applicants respectfully traverse this rejection.

Martins discloses processing digital images to identify non-overlapping segments between successive images.

15

With respect to claim 1, Martins fails to disclose "said SIMD processor having an associated image area separating means configured such that said SIMD processor separates image data into a character portion and a figure portion." As noted above, Martins discloses comparing a first digital image with a second digital image to determine non-overlapping regions and does not discuss separating the image data into a "character portion" from the "figure portion." As such, the rejection of claim 1 should be withdrawn and claim 1 and its dependant claims allowed over Martins.

With respect to claim 11, Martins fails to disclose "a SIMD processor for performing an image-area separation process, said SIMD processor having an associated image-area separation means configured such that SIMD processor separates image data into a character portion and a figure portion" As noted above, Martins discloses comparing a first digital image with a second digital image to determine non-overlapping regions and does not discuss separating the image data into a "character portion" from the "figure portion" as part of the Martin's process for comparing the first and second data images. As such, the rejection of claim 11 should be withdrawn and claim 11 allowed over Martins.

Claims 12-15, 21 and 23 stand rejected under 35 U.S.C. §103(a) as being anticipated by Chatterjee. Applicants respectfully traverse this rejection.

With respect to claim 12, as noted above Chatterjee fails to disclose "said SIMD processor having an associated image-area separation means configured such that said SIMD processor separates image data into a character portion and a figure portion" and "an image-processing means for switching over contents of the image data in accordance with the result of the image-separation operation performed by the image-separation

16

apparatus." As such, the rejection of claim 12 should be withdrawn and claim 12 allowed over Chatterjee.

With respect to claim 13, Chatterjee fails to disclose "causing the SIMD processor to perform the image-area separation for separating the image data into a character portion and a figure portion" as noted above. As such, the rejection of claim 13 should be withdrawn and claim 13 and its dependant claims allowed over Chatterjee.

With respect to claim 21, Chatterjee fails to disclose "causing the SIMD processor to separate the image data into a character portion and a figure portion" as noted above. As such, the rejection of claim 21 should be withdrawn and claim 21 and its dependant claim allowed over Chatterjee.

Claims 13 and 21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Martins. Applicants respectfully traverse this rejection.

With respect to claim 13, Martins fails to disclose "causing the SIMD processor to perform the image-area separation for separating the image data into a character portion and a figure portion" as noted above. As such, the rejection of claim 13 should be withdrawn and claim 13 allowed over Martins.

With respect to claim 21, Martins fails to disclose "causing the SIMD processor to separate the image data into a character portion and a figure portion" as noted above. As such, the rejection of claim 21 should be withdrawn and claim 21 allowed over Martins.

Claims 13-17, 19, 21, 23-25, and 27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Nomizu. Applicants respectfully traverse this rejection.

With respect to claim 13, Nomizu fails to disclose "causing the SIMD processor to perform the image-area separation for separating the image data into a character portion and a figure portion" as noted above. As such, the rejection of claim 13 should be withdrawn and claim 13 and its dependant claims allowed over Nomizu.

With respect to claim 21, Nomizu fails to disclose "causing the SIMD processor to separate the image data into a character portion and a figure portion" as noted above. As such, the rejection of claim 21 should be withdrawn and claim 21 and its dependant claims allowed over Nomizu.

Claims 6-8, 10, and 26 stand objected as being dependant upon a rejected base claim but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Claims 6-8 and 10, and 26 depend from claims 1 and 21, respectively, and are allowable for at least those reasons noted above with respect claims 1 and 21, respectively.

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Dated: August 29, 2007   Respectfully submitted,
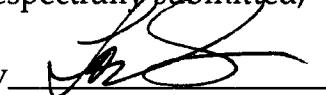
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